

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : **CRIMINAL NO.** _____

v. : **DATE FILED:** _____

RICHARD MALAK : **VIOLATIONS:**
JEROME I. ROMAN **26 U.S.C. § 7206(1) (false tax return - 2 counts)**

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

On or about April 15, 1999, in the Eastern District of Pennsylvania,

defendant

RICHARD MALAK

willfully made and subscribed a United States income tax return, Form 1040, for the calendar year 1998, which was verified by a written declaration that it was made under the penalty of perjury and filed with the Internal Revenue Service, which defendant RICHARD MALAK did not believe to be true and correct as to every material matter, in that the return substantially underreported his total income, when in fact, as defendant RICHARD MALAK well knew, his total income was substantially more than what he

reported, in that, he had received \$60,000 in unreported payments from Camden Ordinance and related parties.

In violation of Title 26, United States Code, Section 7206(1).

COUNT TWO

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

On or about October 12, 1999, in the Southern District of New York,
defendant

JEROME I. ROMAN

willfully made and subscribed a United States income tax return, Form 1040, for the calendar year 1998, which was verified by a written declaration that it was made under the penalty of perjury and filed with the Internal Revenue Service, which defendant JEROME I. ROMAN did not believe to be true and correct as to every material matter, in that the return substantially underreported his total income, when in fact, as defendant JEROME I. ROMAN well knew, his total income was substantially more than what he reported, in that, he had received \$37,769 in unreported payments from Camden Ordnance and related parties.

In violation of Title 26, United States Code, Section 7206(1).

NOTICE OF ADDITIONAL FACTORS

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. In committing the offense charged in Count One of this information,
defendant RICHARD MALAK:

a. Caused a tax loss and attempted tax loss of \$13,261, as described
in U.S.S.G. §§ 2T1.1 and 2T4.1.

b. Failed to report and correctly identify the source of income
exceeding \$10,000 in a year from criminal activity, as described in U.S.S.G.
§ 2T1.1(b)(1).

2. In committing the offense charged in Count Two of this information,
defendant JEROME I. ROMAN:

a. Caused a tax loss and attempted tax loss of \$10,575.32, as
described in U.S.S.G. §§ 2T1.1 and 2T4.1.

b. Failed to report and correctly identify the source of income
exceeding \$10,000 in a year from criminal activity, as described in U.S.S.G.
§ 2T1.1(b)(1).

PATRICK L. MEEHAN
UNITED STATES ATTORNEY